

EXHIBIT E

Toth, Ashley L.

From: Toth, Ashley L.
Sent: Wednesday, December 18, 2024 4:19 PM
To: Yatvin, Alan
Cc: Santarone, Joseph J.; Cohen, Noah S; Andrew Shubin; Marmer, Erin
Subject: RE: Calderaio v. CBSD

Good afternoon Alan-

Joe and I are available on 12/23 for a conference call at 9:30 to meet and confer.

Our office is also available for deposition on the following dates:
January: 13, 14, 16, 17, 22, 23, 24, 27 (after 10:30 am), 28, 29, 30, 31
February: 3, 4, 5

Thank you,
Ashley



Ashley L. Toth

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From: Yatvin, Alan <ayatvin@weirlawllp.com>
Sent: Tuesday, December 17, 2024 4:04 PM
To: Toth, Ashley L. <ALToth@MDWCG.com>
Cc: Santarone, Joseph J. <JJSantarone@MDWCG.com>; Cohen, Noah S <ncohen@weirlawllp.com>; Andrew Shubin <shubin@shubinlaw.com>; Marmer, Erin <emarmer@weirlawllp.com>
Subject: RE: Calderaio v. CBSD

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Ashley-

Your Responses to the March 1, 2024, RFP are woefully inadequate. I will address those inadequacies at the end of this email and in the attached table. Further, you have failed to address the other insufficiencies, commitments by you, and requests for deposition dates, raised in my emails, some dating back to mid-October. We are really running out of time. It is long past time for you and your client to bring discovery responses current and complete, so we can get on with depositions in the little time left to us. This needs to be a priority, because I know that after months of inadequacy,